

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
TEHUM CARE SERVICES, INC., ¹)	
)	Case No. 23-90086 (CML)
)	
Debtor.)	
)	(Emergency Hearing Requested)

NOTICE OF DESIGNATION AS COMPLEX CHAPTER 11 BANKRUPTCY CASE

On February 13, 2023, above-captioned debtor and debtor-in-possession (the “Debtor”) filed a voluntary petition for relief under title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas. The undersigned proposed counsel believes that this chapter 11 case qualifies as a complex chapter 11 case because:

- | | |
|--------------|---|
| <u> X </u> | The Debtor has total debt of more than \$10 million; |
| <u> X </u> | There are more than 50 parties in interest in this case; and |
| _____ | Claims against the Debtor is publicly traded. |
| _____ | Other (Substantial explanation is required. Attach additional sheets if necessary.) |

¹ The last four digits of the Debtor’s federal tax identification number is 8853. The Debtor’s service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

WHEREFORE, the Debtor respectfully requests that the Court enter the Order, granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Respectfully submitted this 15th day of February, 2023.

GRAY REED

By: /s/ Jason S. Brookner

Jason S. Brookner
Texas Bar No. 24033684
Aaron M. Kaufman
Texas Bar No. 24060067
Lydia R. Webb
Texas Bar No. 24083758
Amber M. Carson
Texas Bar No. 24075610

1300 Post Oak Boulevard, Suite 2000
Houston, Texas 77056

Telephone: (713) 986-7127

Facsimile: (713) 986-5966

Email: jbrookner@grayreed.com
akaufman@grayreed.com
lwebb@grayreed.com
acarson@grayreed.com

*Proposed Counsel to the Debtor
and Debtor in Possession*

Certificate of Service

I certify that on February 15, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Jason S. Brookner

Jason S. Brookner